



# Advocate

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# **Big Decisions Mark Milestone for ETTP**

The release of two key decision documents this summer regarding the East Tennessee Technology Park (ETTP) signals a turning point in the Department of Energy's (DOE's) Environmental Management (EM) Program work at the former gaseous diffusion plant.

in continuing resolution for some weeks, so critical EM decision-making will have to wait until Congress can refocus on the budget. In the meanwhile, it's a good time to review what's been going on at the ETTP site.



#### K-25/K-27 EE/CA

The K-25 and K-27 buildings were constructed for the production of enriched uranium hexafluoride for defense purposes and later nuclear power reactors. The engineering evaluation/cost analysis (EE/CA) for these buildings addresses the non-time-critical removal of the buildings and their contents. The preferred

alternative involves equipment and piping removal, preparation for disposal, and transportation and disposal at a facility where the waste meets acceptance criteria. Following equipment removal, the proposed plan is for the buildings to be demolished.

Complicating this task is the fact that the K-25 building has been included in the National Register of Historic Places. DOE must therefore consider impacts from the proposed action to minimize adverse effects to this historic property. Following the public comment period on the EE/CA, a memorandum of agreement will set forth measures to preserve the history of the facility.

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The Engineering Evaluation/Cost Analysis for the Decontamination and Decommissioning of the K-25 and K-27 Buildings at ETTP and the Proposed Plan for Interim Remedial Actions for Selected Contaminated Soil, Material, and Buried Waste Areas Within Zone 1 at ETTP were released in July and August, respectively.

Decisions on these projects are focal because they address one of the largest cleanup tasks at the site (Buildings K-25/K-27) and the start of cleanup in the area outside the ETTP fence. Add these big decisions to the substantial progress made through completed and ongoing projects, and work would seem to be progressing nicely at the 1,500-acre site. The 91-million-dollar question, though, is how DOE will sustain progress at ETTP in the face of proposed budget cuts. Because of the recent terrorist crisis, the FY 2002 budget will likely be

#### Zone 1 Proposed Plan

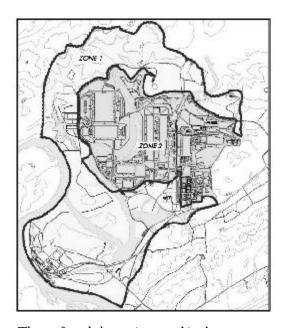
DOE, the U.S. Environmental Protection Agency (EPA), and the State of Tennessee

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## Big Decisions at ETTP

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agreed in September 2000 to a path forward for the cleanup of ETTP. This agreement includes an interim decision on soil remediation in the areas outside the main fence, which have been collectively designated "Zone 1."



The preferred alternative stated in the Zone 1 proposed plan is to excavate contaminated soil and dispose of it at the on-site waste management facility in Bear Creek Valley. Once the soil has been remediated in Zone 1, additional data will be collected to support a final decision on soil, groundwater, surface water, and sediments in that zone.

What's really important about this plan, according to Jim Kopotic, DOE's ETTP remediation manager, is that "This really begins the cleanup process outside the fence, consistent with our cleanup strategy of removing buildings to gain access to contaminated soils while at the same time cleaning up impacted areas. We have records of decisions for some single, defined areas, like K-1070-A, but this is the first record of decision for a large-area operable unit at ETTP."

# Building Decontamination and Decommissioning (D&D)

"Old and in the way" sums up the condition of numerous buildings at ETTP, so DOE is demolishing many of

them. Demolition on the first five was completed in April 1999. These were selected to go first because of their poor condition, proximity to surface water or other structures, expense of surveillance and maintenance, or a combination of these factors.

DOE has now started demolition on a second group of buildings, which includes 10 above-ground facilities. Six of these have been razed so far, including the original administration building, K-1001. These buildings are being demolished when it has been determined that they are of no future use or are structurally unsound.

#### Reindustrialization

Many of the buildings that remain in good shape have a future under DOE's Reindustrialization Program. With this approach, DOE is accomplishing cleanup of underutilized facilities and equipment by making them available for productive use by the commercial sector. Reindustrialization employs three mechanisms: contracting, bartering, and leasing.

An example of contracting is BNFL's fixed-price contract to D&D three large buildings at ETTP. According to Susan Cange, DOE's Reindustrialization Division leader, the BNFL contract will save more than \$477 million over traditional D&D approaches and has created more than 900 new jobs.

Bartering involves the use of equipment and/or facilities at reduced

rates in exchange for cleanup services. Current savings to DOE through bartering arrangements total over \$4.64 million in current year dollars, according to Cange.

Leasing underutilized facilities to private interests is arranged through the Community Reuse Organization of East Tennessee. About 150 facilities of ETTP's 500 buildings are planned for reuse. Cange says that leases reduce building surveillance and maintenance and utility expenses and that the combined savings over a 30-year period for the leases that are in place today is estimated at \$165 million. A total of 72 leases and subleases have been signed with 36 companies to occupy space on the Oak Ridge Reservation.

#### TSCA Incinerator

The TSCA Incinerator (TSCAI) is the only active incinerator in the DOE complex, although it, too, has been scheduled to be shut down at the end of September 2003. DOE completed a controlled "trial" burn of the incinerator in May, the results of which will be used by the state and EPA to establish conditions for renewal of the incinerator's operating permits. A 41,291-page report on the trial burn will be available soon, but you may want to read the summary, which ORSSAB hopes to make available through its web site in late September.

#### K-1070-A Burial Ground

The K-1070-A Burial Ground was opened just west of the ETTP site in the 1950s to receive wastes from the gaseous diffusion plant. The one-acre site contains 26 trenches and 62 pits used for disposal of uranium-contaminated materials.

A remedial investigation completed in 1996 indicated that metals, organics, and radionuclides may have been leaching from the site into

## Big Decisions at ETTP

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groundwater. A record of decision for the site was signed in January 2000, identifying plans to excavate and dispose of the buried material.

In June 2001. DOE released the Remedial Action Work Plan/Remedial Design Report for the K-1070-A Burial *Ground*, which documents the plans and schedule for accomplishing remedial actions at the site. The selected remedy—waste removal and disposal and institutional controls consists primarily of excavating the waste from the pits and trenches and disposal in the on-site waste management facility in Bear Creek Valley. Characterization of the pits and trenches is underway now, and removal of material should be completed by October next year.

#### **BNFL**

A \$238 million, fixed-price contract was awarded to BNFL, Inc., in August 1997 for D&D of materials within the K-29, K-31, and K-33 buildings at ETTP. The three buildings contained more than 4.89 million square feet and housed more than 136,000 tons of contaminated or potentially contaminated material. The purpose of the project is to clean out the buildings to make them available for reuse without radiological and other safety concerns.

In FY 2000, BNFL disposed of 50,580 tons of metal from K-33, either as low-level waste or recycled metal. Over 13,000 tons of stabilized pond waste were shipped to Envirocare. Over 4,600 tons of switchyard metals were shipped for unrestricted off-site release. The K-31 and K-33 switchyard equipment demolition removal was completed, with a total of 4,615 tons of metal removed and dispositioned. As of August 2001, overall cleanup of K-33 is now more than 75% complete, and the overall K-29/K-31/K-33 project is more than 38% complete.

## **Recent Recommendations & Comments**

Recommendation that DOE Grant ORSSAB a Seat on the Oak Ridge Reservation Land-Use Focus Group

DOE recently announced the creation of a new focus group and land-use planning process for the Oak Ridge Reservation (ORR). Because environmental cleanup will have a bearing on planning, ORSSAB requested that a member of the Board sit on the focus group. Following is ORSSAB's letter to DOE-Oak Ridge Operations Office Manager Leah Dever.

We understand that DOE officially announced the creation of a new focus group and land-use planning process during a press conference on August 29. According to reports, the process will focus on the environmental assets of Oak Ridge, with the goal of drafting a "roadmap for development on the reservation" and that this process will allow for the identification of properties which should be off limits to development. The land-use group is purportedly a compromise to DOE's performing an extensive and complex environmental impact statement on the entire reservation.

We further understand that the landuse focus group includes representatives from various governmental entities, business organizations, and advocacy groups. Among these advocacy groups are Advocates for the ORR, Friends of Oak Ridge National Laboratory, the Nature Conservancy, and the Tennessee Conservation League.

As you know, ORSSAB has since 1995 been an interested and involved party in environmental land-use issues at the ORR. Our board served as leader of the End Use Working Group and continues advocacy of land-use issues through our stewardship initiatives.

Because aspects of the environmental cleanup program will have a bearing on the land-use planning process, we ask that an ORSSAB member sit on the land-use focus group. This request received the unanimous support of our members at our September 12 meeting.

Recommendations & Comments on the EE/CA for the Decontamination and Decommissioning of the K-25 and K-27 Buildings at ETTP

The K-25 and K-27 buildings at ETTP have been proposed for demolition, based on their poor condition and the expense and risk of surveillance and maintenance activities. An engineering evaluation/cost analysis (EE/CA) for this project was issued for public review in July 2001.

The preferred alternative involves equipment removal, building demolition, and disposal of wastes. The time frame is 8 years, and the cost is \$294 million.

The ORSSAB Waste Management Committee reviewed the EE/CA and made several comments on it plus the following recommendations, which the Board has asked DOE to address in the project's action memorandum since a revised EE/CA will not likely be issued. The Board did not offer comments on mitigation alternatives related to historic preservation considerations.

ORSSAB recommends that DOE add explanation in the action memorandum for the K-25 and K-27 project to address the following questions:

- How will DOE survey the converters?
- How will macroencapsulation be performed?
- How will issues of size, void space, and placement and protection of classified material from K-25 and K-27 be addressed relative to the Environmental Management Waste Management Facility (EMWMF)?
- How will DOE evaluate acceptability of the converters relative to the EMWMF waste acceptance criteria?

## **Reservation News**

# Out-of-State Wastes Slated for Incineration at TSCAI

In July, DOE released its draft FY 2002 Burn Plan for the Toxic Substances Control Act Incinerator (TSCAI), and for the first time, the incinerator is slated to burn mostly out-of-state waste.

The pre-existing stockpile of burnable waste in Oak Ridge is nearly exhausted, and most of what Oak Ridge is sending to TSCAI now is newly generated material. According to the burn plan, TSCAI would incinerate over 700,000 pounds of waste from Colorado, Idaho, Kentucky, Nevada, New York, Ohio, and South Carolina, and from nuclear-powered Navy vessels. These sources will almost double the amount of waste recently burned.

The state of Tennessee did not approve the FY 2001 burn plan until May 2 of this year, and indications are that approval of this burn plan will be delayed as well. The FY 2001 plan was held up because of several policy issues, including problems obtaining off-site disposal options for Oak Ridge wastes and a lack of commitment on the part of DOE to resolve legacy waste issues.

This year the holdup will likely be the Oak Ridge cleanup budget. If funding is slashed, DOE will have to renegotiate milestones for cleanup projects—something many parties in Oak Ridge, including the SSAB, do not want to see happen.

# Duratek Gets Contract for First Phase of K-25/K-27 Cleanup

Duratek Federal Services, Inc., was awarded a 3-year, \$22 million contract in late August for asbestos removal and other activities in the first phase of decontamination and decommissioning (D&D) of the K-25 and K-27 buildings at the East Tennessee Technology Park.

The contract was awarded by Bechtel Jacobs Company LLC, which is DOE's prime contractor for environmental cleanup activities at the Oak Ridge Reservation. This is the fourth contract Duratek has received from Bechtel Jacobs in the past 2 years.

The project involves the removal of about 44,000 cubic yards of asbestos and other materials. Duratek will perform hazardous materials abatement and waste management services, including packaging, transportation, and disposal of the waste.

D&D activities at K-25 and K-27 will be accomplished in three phases:

- (1) hazardous material abatement,
- (2) process equipment removal, and
- (3) building demolition.

# DOE Creates Land-Use Focus Group and Planning Process

On August 29, DOE-Oak Ridge announced the creation of a new focus group and land-use planning process for the Oak Ridge Reservation.

The process will identify DOE properties that should be set off limits to development and will create a "roadmap for development on the reservation." The land-use group is reportedly a compromise to DOE's performing an extensive and complex environmental impact statement for the entire reservation.

The land-use focus group includes 16 governmental entities, business organizations, and advocacy groups.

Because aspects of the environmental cleanup program will have a bearing on

the land-use planning process, the SSAB requested on September 12 that a member of the advisory board sit on the land-use focus group (see "Recent Recommendations and Comments").

# EPA Takes Samples in Oak Ridge's Scarboro Community

The Environmental Protection Agency (EPA) took soil, water, and sediment samples from 10 sites in the Scarboro Community during the week of September 24.

According to Connie Jones, an EPA remedial project manager who also serves as EPA's representative to the SSAB, the purpose of the sampling is to validate results of DOE sampling performed in the Scarboro Community in May 1998. The results of DOE sampling, which were reported in the Scarboro Community Environmental Study last September, showed little variance with sampling results in other parts of the city.

Jones says that EPA is sampling in Scarboro in response to a request from the community and that "it conforms with the agency's community involvement agenda by providing technical advice and assistance to the community."

EPA discussed the *Draft Environmental Sampling Plan for the Scarboro Community* with the SSAB in September 1999. ORSSAB made many comments on the draft sampling plan, which may be viewed on the Internet at http://www.oakridge.doe.gov/em/ssab/recomm.htm. EPA sampling was originally slated to start in fall or winter of 1999.

# Results of the Stakeholder Survey

ORSSAB surveys the members of its mailing list each year to learn what issues are most important to them and to find out how well the Board is doing in communicating with the public. This information is used at the Board's annual planning retreat to help decide which aspects of DOE's Environmental Management Program to focus on and to measure and target public outreach efforts in the coming year.

The survey was sent out in July to 450 individuals and organizations, and 74 responses were received. The first table below lists survey topics and the average rating received. The second table shows responses to ORSSAB-related questions.

Although interest dropped somewhat, the top two vote getters from last year, cleanup budget and cost-effectiveness of cleanup decisions (both with 7.6 averages last year), were high on the list this year as well, with averages of 7.1 and 6.6, respectively.

Ratings were virtually unchanged from last year for stewardship (last year 7.0), reindustrialization (6.1), treatment and disposal of waste (6.6), and worker and community health concerns (6.4).

Interest in the on-site waste cell dropped from 6.3 last year to 5.4 now, but the TSCA Incinerator number was up from 4.9 to 5.7 this year.

Ratings for ORSSAB-related questions were similar to last year's results. For question 1, last year's results were 75% yes, 8% no, 17% don't know. Question 2 results last year were 49% yes, 18% no, 32% don't know. For Question 3, results were 35% yes, 65% no. Results for question 4 were 95% yes, 5% no.

The Board thanks everyone who participated in this year's survey. If you haven't responded, you can still participate by filling in the survey on the Board's Web site at http://www.oakridge.doe.gov/em/ssab.

Topic	Average Rating
Cleanup budget and prioritization	7.1
Land and facility stewardship	6.7
Cost-effectiveness of cleanup decisions	6.6
Treatment & disposal of waste	6.4
Worker and community health concerns	6.3
Reindustrialization of DOE sites	6.0
Toxic Substances Control Act Incinerator	5.7
On-site waste cell construction	5.4

Question	Yes	No	Don't Know
Do you think ORSSAB is a credible, independent public voice?	79%	16%	5%
Do you think ORSSAB represents your views on DOE matters?	40%	24%	36%
Have you been to an ORSSAB meeting in the past 6 months?	33%	77%	
Are you aware that all ORSSAB meetings are open to the public?	96%	4%	

## Board Sets FY 2002 Work Plan

Each August the SSAB holds a planning retreat to reflect on the past fiscal year's performance and chart a course for work in the coming months. This year's event was held Friday and Saturday, August 3 and 4, at Rothchild Catering in Knoxville.

If success is measured in the number of recommendations sent to DOE, it was a banner year. A record 20 recommendations were made on topics such as long-term stewardship, the budget, the TSCA Incinerator, and various environmental remediation decisions. Not bad for a "rebuilding" year, in which 14 of the 20 members had served on the Board for a year or less.

Topics that the Board should look at in its FY 2002 work plan were proposed by Board members, DOE, the U.S. Environmental Protection Agency, the Tennessee Department of Environment and Conservation, and the public, through the Stakeholder Survey.

Top issues for the Board's Environmental Restoration Committee were (1) oversight of remedy selection and implementation; (2) DOE's FY 2002 budget, funding, and priorities; (3) management of buried uranium; and (4) participation in the upcoming joint SSAB groundwater workshop in Augusta, Georgia.

For the Stewardship Committee, issues were (1) incorporating stewardship into legal documents, (2) the Long-Term Stewardship Management Plan, and (3) creation of the Citizens Board for Stewardship.

Waste Management Committee issues were (1) the EM Waste Management Facility, (2) the TSCA Incinerator, (3) the programmatic environmental impact statement on scrap metal, and (4) rail access to the Nevada Test Site.

# New ORSSAB Members, Student Representatives Sign On

Seven new members and two student representatives have been added to the SSAB in the past few months, bringing the Board to full membership of 20.

ORSSAB members are selected by an independent citizen screening panel to help ensure diversity and are chosen to reflect the gender, race, occupations, and interests of persons living near the Oak Ridge Reservation. Appointments are for 2 years, with the possibility for reappointment twice. Following are biographies of the new members and student representatives.



Jeanne Bonner
Jeanne is employed
by UT-Battelle at
Oak Ridge National Laboratory
(ORNL). She has a
degree in chemical
engineering and

experience in radiochemical processing, hazardous waste operations, and emergency response. An Oak Ridge resident, Jeanne is an active member of the PTA, Society of Women Engineers, and Delta Sigma Theta Sorority, Inc.



Ryan Burton Ryan is a senior at Roane County High School, where his course work includes advanced placement calculus, chemistry, and

physics—subjects that figure into his plans for a career in either the medical or environmental fields. Ryan's hobbies include hiking, camping, and boating.



Donna Campbell
Donna was a
charter member of
the Board and
served two terms
(1995–1999) in
addition to her
current term. She is

a librarian for Foster Wheeler Environmental Corp. and holds undergraduate and graduate degrees in biology and library science. A Harriman resident, Donna is a preschool teacher and is active in the jail ministry at First Baptist Church of Kingston. She also volunteers with local public libraries.



Heather Cothron Heather is employed by Science Applications International Corporation (SAIC) as an engineer and

project manager at ORNL. She holds a B.S. degree in biology and an M.S. degree in chemical engineering. She is a former regulator with the state and DOE representative on the FUSRAP community/stakeholder group. Heather is a resident of Oliver Springs.



Patricia H. Hill
Pat is an artist and
teacher who has
worked as an art
director for the
Boys & Girls Clubs
of Knoxville, as a
graphic artist at the

Knoxville News-Sentinel, and as a teacher at Knoxville's Apostolic Christian School. She is a Knoxville resident and former member of the East Tennessee Cherokee Indian League.



Alix King
Alix is a senior at
Oak Ridge High
School, where her
course work
includes English,
world history,
physics, and

advanced placement statistics. Her career interests center on the environmental field, in areas such as genetically modified food and marine biology. She works part-time for SAIC in the

Environmental Project Management area and is active in sports.



Robert McLeod Robert is a Registered Professional Engineer and Registered Professional Geologist with Robert S. McLeod and

Associates. He has more than 30 years experience in engineering management and environmental work and has managed numerous DOE projects, including two remedial investigation/feasibility studies and the program to implement the DOE Hazardous Waste Remedial Actions Program. From 1988 to 1996 he managed the Oak Ridge office of Parsons Engineering Science, Inc. Robert resides in Oak Ridge.



Luis Revilla
Luis is Captain of
the Fire Department at the Y-12
National Security
Complex. He is a
certified paramedic, fire fighter,

fire inspector, and hazardous materials technician. He holds an Associate of Arts degree and is a graduate of the Donnellson Law Enforcement Academy. Luis lives in Knoxville, where he serves as assistant coach of the Farragut community baseball team and is involved in church activities.



E.W. Seals
E.W. is a machinist with UT-Battelle at ORNL. He is treasurer of the Atomic Trades and Labor Council, and hopes to help those

in the community without technical or scientific backgrounds understand the environmental issues on the Oak Ridge Reservation. E.W. lives in Lenoir City.

## **Three Charter Members Retire**

After 6 years, 70 board meetings, and an untold number of committee sessions, 3 charter members of the Board called it quits on June 13.

Bill Pardue, Pat Rush, and Lorene Sigal had served on ORSSAB since its inception in August 1995.
They are the only charter members to have remained on the board for the entire six years of service allowed by

Awards of service were presented to the retiring members by DOE-ORO Manager Leah Dever at the June 13 ORSSAB meeting.

ORSSAB bylaws.

"It's from the bottom of my heart that I want to thank
Lorene, Bill, and Pat for their service," said Dever. "We really appreciate the time, effort, and hard work they've put into this program."

Bill served as ORSSAB Chair in 1998 and 1999 and as Vice Chair in 1997. Pat was the leader of the ETTP Remediation and Reindustrialization Team in 1998 and co-chair of the Environmental Restoration Committee in 2001. Lorene Sigal served as leader of the Budget & Prioritization Committee in 1998 and 1999, as leader of the Stewardship Working

Group in 1999, and as leader of the Stewardship Committee in 1999, 2000, and 2001.

All three have served on numerous ORSSAB committees throughout their tenures on the Board.



Leah Dever, DOE-ORO Manager (far left), presented awards of service at the June 13 ORSSAB meeting. Shown left to right are Bill Pardue, Lorene Sigal, and Pat Rush.

Ms. Dever concluded by saying that "We (DOE) have been able to make some tremendous improvements in the Environmental Management Program over the past six years, and it's largely through the help of this group."

It's also been largely through the excellent leadership provided by Bill, Lorene, and Pat that the Oak Ridge SSAB has been able to produce such high-quality recommendations and advice over the past 6 years. Thanks!



At its annual meeting August 4, the Board re-elected officers who had served in FY 2001: Luther Gibson -Chair, Dave Mosby - Vice Chair, Corkie Staley - Secretary. Following are brief biographies of the officers.



Luther Gibson, Jr. Luther works in the BWXT Y-12 Analytical Chemistry Organization and holds an M.S. degree in chemical

engineering. He has worked for DOE contractors for 24 years on environmental technologies. He was 1998-99 chair of the East Tennessee Chapter of the Air & Waste Management Association.



Dave Mosby
Dave is a project
manager with
BWXT Y-12,
where he manages
multi-discipline
facility support
projects at the

Y-12 Plant. He is a community representative for the NAACP and a member of Oak Ridge City Council. Dave was a member of the Oak Ridge Regional Planning Commission where he chaired the zoning committee.



Coralie "Corkie"
Staley
Corkie is an
elementary school
teacher in
Oak Ridge and
holds an M.S.
degree in

curriculum and instruction. She is the current president of the Oak Ridge Education Association and is a member of the Tennessee Education Association and the National Education Association. She has lived in Oak Ridge for 17 years.



ORSSAB members toured the Oak Ridge Reservation and the American Museum of Science and Energy on August 18 to gain a better understanding of environmental cleanup issues. Shown left to right are Heather Cothron, Bob McLeod, Luther Gibson, Donna Campbell, Pat Hill, and Luis Revilla.

# Report from the National SSAB Chairs' Meeting

By Luther Gibson, ORSSAB Chair

The Chairs of the SSABs meet twice yearly to discuss DOE Environmental Management (EM) projects and policy, gain understanding of relevant technical issues, and develop personal contacts with their counterparts at other sites. The recent Chairs' Meeting held August 26-29 in Santa Fe, New Mexico, was hosted by the Northern New Mexico Citizens' Advisory Board.

Gene Schmitt, Acting Deputy Assistant Secretary for Policy, Planning, and Budget for DOE-EM, started off the business portion of the meeting with a discussion of the Department's "Top-Down Review" and highlights of the FY 2002 budget request.

Most chairs were in agreement that the SSABs should be involved in the Top-Down Review from the onset of

planning. Mr. Schmitt was unable to supply details or commit to how the SSABs could be involved, so the matter was left that Martha Crosland, DOE-Headquarters' Designated Federal Official for the SSABs, would track planning for the review and keep the Chairs up to date.

Some budget specifics were available. DOE's EM request for FY 2002 was \$5.9 billion. To date, the House bill is at \$6.6 billion, and the Senate bill is at \$6.8 billion. The FY 2001 budget was \$6.4 billion. Nothing encouraging emerged about the possible \$91 million shortfall in local Oak Ridge EM funding. The House bill would add only \$20 million and the Senate bill only \$14 million, both at ETTP.

Mr. Schmitt said that DOE did not have a strategy based on renegotiation of existing enforceable agreements.

The lion's share of the meeting was devoted to discussions among the Chairs about issues of concern at their sites, the budget, the sites' scopes of work and their relationship with DOE, and how DOE responds to the SSAB's recommendations.

Although we were just preparing for our new Board year and had not fully completed project prioritization and work planning, our listed major concerns included the budget, adequate and enforceable stewardship provisions in CERCLA records of decision, and the scrap metal programmatic environmental impact statement (which may affect ongoing remediation work at ETTP).

The next gathering of the SSABs was scheduled as a workshop on groundwater to be held November 8-10 in Augusta, Georgia.

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